

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

continued unimpeded. Oren Alexander, also present in the apartment and well aware that Ms. Doe was being raped, did not lift a hand to help or stop the attacks.

3. While this event was life-altering for Ms. Doe, it is fully consistent with the Alexander brothers' well-documented *modus operandi*. Tal, Alon and Oren Alexander were recently arrested on federal sex trafficking charges for their horrific and prolific sexual assaults of dozens of women all over the United States and beyond.<sup>1</sup> Their arrests came after months of public allegations and civil lawsuits. To date, more than 40 women have come forward to accuse the brothers of sexual assault—sometimes the brothers acted alone and sometimes they all acted together.<sup>2</sup>

4. Ms. Doe brings this action to ensure that Tal and Alon Alexander are held accountable for the brutal sexual assaults. She is seeking injunctive and declaratory relief and compensatory and punitive damages against Defendants in violation of the Victims of Gender-Motivated Violence Protection Law, Gender Motivated Violence Act, N.Y.C. Admin. Code §§ 10-1101, *et seq.* (“VGMVPL”).

### **JURISDICTION AND VENUE**

5. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332, as this action involves citizens of different states and the amount in controversy in this matter exceeds \$75,000.

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<sup>1</sup> See <https://www.justice.gov/usao-sdny/pr/alon-alexander-oren-alexander-and-tal-alexander-charged-manhattan-federal-court-sex>.

<sup>2</sup> See <https://nypost.com/2025/01/04/us-news/accused-sex-trafficker-alon-alexander-to-remain-behind-bars/>.

6. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this Court because a substantial part of the events or omissions giving rise to this action, including the unlawful conduct alleged herein, occurred in this district.

### **PARTIES**

7. Plaintiff Jane Doe resides outside the State of New York and in a diverse state from all Defendants.

8. Defendant Tal Alexander resides in Florida.

9. Defendant Alon Alexander resides in Florida.

### **FACTUAL ALLEGATIONS**

10. Ms. Doe met Tal Alexander, Alon Alexander and Oren Alexander when she was living in New York City in 2011.

11. Ms. Doe had seen them out at events before, so she accepted an invitation to hang out at the Alexander brothers' shared apartment.

12. When she arrived, Alon Alexander and Oren Alexander (who are twins), were in the living room.

13. As a group, they briefly relaxed and socialized.

14. During this time, Ms. Doe was made and drank at least two cocktails containing hard liquor.

15. Upon information and belief, these cocktails were spiked with date rape drugs that diminished Ms. Doe's capacity and faculties.

16. What happened next was horrific: Ms. Doe was then vaginally raped by Alon and Tal Alexander, in a coordinated sexual assault.

17. First, with Ms. Doe's capacity diminished, Alon Alexander raped Ms. Doe in one of the bedrooms.

18. With Ms. Doe lying down on the bed, he positioned himself between her legs at the side of the bed.

19. He grabbed her legs, wrapped them around him, leaned over her and penetrated her with his penis.

20. Ms. Doe was unable to move or stop him.

21. Ms. Doe, confused and lacking her full capacity, said "What?! No!"

22. Alon Alexander proceeded to rape Ms. Doe despite her plea for him to stop.

23. Alon Alexander finished sexually assaulting Ms. Doe and left the room.

24. Immediately after, Tal Alexander opened the door to the bedroom.

25. Ms. Doe had not seen Tal Alexander in the living room before, which made her confused about where he had come from.

26. Ms. Doe vividly recalls thinking, "What?!?! Who the FUCK is THAT?? What is happening??"

27. Tal Alexander then vaginally raped Ms. Doe as well, while she repeatedly said "No!" and pleaded for him to stop.

28. When Tal Alexander was finished, he left the room.

29. Ms. Doe, fearing that more was coming, quickly got dressed and left the bedroom.

30. As she passed through the living room, she saw Oren Alexander still sitting on the couch. He asked, while smirking, "How was it?"

31. Ms. Doe then exited the apartment.

32. She remembers having a panic attack after leaving the apartment.

33. Ms. Doe has been forced to live with the fact of these sexual assaults for her entire adult life, and it has caused her irreparable emotional and physical pain.

34. The Alexander brothers' attack on Ms. Doe is consistent with their *modus operandi* of using illicit substances to reduce their victims' capacity and then raping their victims together, one after another.

35. Tal, Alon and Oren Alexander are currently facing numerous civil lawsuits alleging that they, sometimes separately and sometimes together, drugged and sexually assaulted a number of women over a span of multiple decades.

36. These alleged assaults occurred all over—including in New York City, the Hamptons, Aspen, Miami and abroad. See e.g. Whiteman v. Alon Alexander, Oren Alexander and Ivan Wilzig, No. 952316/2023 (N.Y. Sup. Ct. N.Y. Cty.); Mandel v. Alon Alexander and Oren Alexander, No. 952356/2023 (N.Y. Sup. Ct. N.Y. Cty.); Parker v. Tal Alexander, Alon Alexander, and Oren Alexander, No. 155547/2024 (N.Y. Sup. Ct. N.Y. Cty.); Willett v. Oren Alexander, No. 24 Civ. 05672 (NRB) (S.D.N.Y.); Gehret v. Alon Alexander and Oren Alexander, No. 24 Civ. 03597 (TPO) (D. Colo.); Jane Doe v. Tal Alexander, 152102/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Tal Alexander, 152101/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Tal Alexander, 152100/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Tal Alexander and Oren Alexander, 152099/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Oren Alexander, 152098/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Tal Alexander, 152097/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Alon Alexander, 152096/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Oren Alexander, 152095/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Tal Alexander and Oren Alexander, 152094/2025 (N.Y. Sup. Ct. N.Y. Cty.); Jane Doe v. Oren Alexander, 152093/2025 (N.Y. Sup. Ct. N.Y. Cty.).

37. On December 11, 2024, the Alexander brothers were arrested in Miami. They are all facing federal sex trafficking charges and potential life sentences in prison.

38. Their indictment reads in part:

From at least in or about 2010, up to and including at least in or about 2021, the ALEXANDER BROTHERS worked together and with others to engage in sex trafficking, including by repeatedly drugging, sexually assaulting, and raping dozens of female victims. . . . At times, multiple men, including one or more of the ALEXANDER BROTHERS, participated in these assaults. . . . On multiple occasions during these events and trips, the ALEXANDER BROTHERS and others surreptitiously drugged women's drinks. Some of the victims experienced symptoms of impaired physical and mental capacity, including . . . incomplete memories of events.<sup>3</sup>

39. It has been reported that more than 40 women have alleged similar experiences, and it is expected that more women will come forward with still more allegations against the Alexander brothers as their criminal and civil proceedings continue.

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<sup>3</sup> See <https://www.justice.gov/usao-sdny/pr/alon-alexander-oren-alexander-and-tal-alexander-charged-manhattan-federal-court-sex>.

**CAUSE OF ACTION**

**Violation of the Victims of Gender-Motivated Violence Protection Law,  
N.Y.C. Admin. Code §§ 10-1101, *et seq.* (“VGMVPL”)  
*Against All Defendants***

40. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

41. Defendants’ conduct constitutes a “crime of violence”<sup>4</sup> against Plaintiff and is a “crime of violence motivated by gender”<sup>5</sup> as defined in § 10-1103.

42. As a direct and proximate result of the aforementioned crime of violence and gender-motivated violence, Plaintiff has sustained, and will continue to sustain, monetary damages, physical injury, pain and suffering and serious psychological and emotional distress, entitling her to an award of compensatory and punitive damages, injunctive and declaratory relief, attorneys’ fees and costs and other remedies as this Court may deem appropriate.

43. The above-described conduct of Defendants constitutes a sexual offense as defined in Article 130 of the New York Penal Law.

44. Pursuant to § 10-1105(a), this cause of action is timely because it is commenced within “two years and six months after September 1, 2022.”

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<sup>4</sup> “The term ‘crime of violence’ means an act or series of acts that would constitute a misdemeanor or felony against the person as defined in state or federal law or that would constitute a misdemeanor or felony against property as defined in state or federal law if the conduct presents a serious risk of physical injury to another, whether or not those acts have actually resulted in criminal charges, prosecution or conviction.” N.Y.C. Admin. Code § 10-1103.

<sup>5</sup> “The term ‘crime of violence motivated by gender’ means a crime of violence committed because of gender or on the basis of gender, and due, at least in part, to an animus based on the victim’s gender.” *Id.*

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays that the Court enter judgment in her favor against Defendants, containing the following relief:

- A. A declaratory judgment that the actions, conduct and practices of Defendants complained herein violate the laws of the City of New York;
- B. An injunction and order permanently restraining Defendants from engaging in any such further unlawful conduct;
- C. A money judgment representing compensatory damages including loss of income, harm to reputation and all other sums of money, in an amount to be determined at trial, plus prejudgment interest;
- D. A money judgment for mental pain and anguish and severe emotional distress, in an amount to be determined at trial, plus prejudgment interest;
- E. Punitive damages and any applicable penalties and/or liquidated damages in an amount to be determined at trial;
- F. An award of attorneys' fees and costs; and
- G. Such other and further relief as the Court may deem just and proper.



**JURY DEMAND**

Plaintiff hereby demands a trial by jury in this action of all issues so triable.

Dated: February 26, 2025  
New York, New York

Respectfully submitted,

**WIGDOR LLP**

By: 

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